

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Chapter 7 Estate of Bernard L.
Madoff,

Plaintiff,

v.

BANK JULIUS BAER & CO. LTD.,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 11-02922 (CGM)

**STIPULATION AND ORDER EXTENDING TIME FOR
DEFENDANT TO FILE AN ANSWER TO THE AMENDED COMPLAINT**

Plaintiff Irving H. Picard, as Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff (the “Trustee”), and Defendant Bank Julius Baer & Co. Ltd. (“BJB”), by and through their respective, undersigned counsel, stipulate as follows:

WHEREAS, on December 28, 2022, this Court entered its *Order Denying Bank Julius Baer & Co. Ltd.’s Motion to Dismiss the Amended Complaint* [ECF No. 135] which, *inter alia*, set a deadline of February 17, 2023 for BJB to file an answer to the Trustee’s Amended Complaint;

WHEREAS, counsel for BJB has requested an extension of the deadline to file an answer to the Amended Complaint until March 3, 2023; and

WHEREAS, no previous motion or application for an extension of time to file an answer to the Amended Complaint has been made.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, and **SO ORDERED**, by the Court:

1. BJB shall file an answer to the Amended Complaint by March 3, 2023.
2. This stipulation and order is without prejudice to, or waiver of, any claims, rights, arguments, or defenses that are otherwise available to the parties.
3. The deadline established by this stipulation and order is without prejudice to either party seeking future extensions of time.

[Signatures appear on the following page.]

Dated: February 15, 2023
New York, New York

/s/ David J. Sheehan

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Attorneys for BJB

**Dated: February 16, 2023
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**